

# **Defendant's Supplemental Exhibit 82**

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: FACEBOOK, INC., MDL No. 2843  
CONSUMER USER PROFILE Case No.  
LITIGATION 18-md-02843-VC-JSC

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This document relates to:  
ALL ACTIONS  
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ZOOM DEPOSITION OF FACEBOOK's 30(b)(6)  
CORPORATE REPRESENTATIVE - SIMON CROSS  
(Reported Remotely via Video & Web Videoconference)  
London, England (Deponent's location)  
Thursday, May 12, 2022  
Volume II

STENOGRAPHICALLY REPORTED BY:  
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Nevada CCR No. 827  
Oregon CSR No. 20-0466  
Washington CCR No. 3491  
JOB NO. 5219195  
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1 Q. (By Mr. Loeser) Okay. And looking at 03:50:13  
2 the Jackie Chang's message, at the beginning of  
3 this thread, she states "Working with KP to further  
4 synthesize P3 impact by breaking out T0 partners  
5 with non-standard agreements and specific 03:50:26  
6 categories of impact that we should address. KP is  
7 working on the pulling the same analysis of the  
8 friend data, but we're also working in parallel to  
9 parse out key partnerships/scenarios that we should  
10 be solving for." 03:50:38

11 Do you see that?

12 A. I see that.

13 Q. So what Jackie Chang is sorting out here  
14 is, among other things, which partners would lose  
15 access to friend permissions and which ones would 03:50:50  
16 not, right?

17 A. Jackie Chang is not making any decisions  
18 in this email. What you see here is a conversation  
19 between a number of people on the partnerships team  
20 attempting to react to a set of potential changes 03:51:09  
21 and how they might impact the partner ecosystem.

22 Q. Okay. And Jackie Chang is -- is helping  
23 to develop a format for how to decide which  
24 partners would have access to friend data, for  
25 example, and which ones would not, right? 03:51:28

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1 MR. DAVIS: Objection. Form. 03:51:36

2 THE DEPONENT: This is a group of people  
3 attempting to put together their -- their best  
4 guess at a framework. But there's nothing that  
5 indicates that this was what was ultimately 03:51:49  
6 implemented.

7 Q. (By Mr. Loeser) Okay. And -- by the  
8 way, if you -- in this document, did you see that  
9 link there, https, and then there's a long URL?

10 A. I do. 03:52:06

11 Q. Okay. How -- how would that work? If  
12 someone sent you this email at Facebook, is -- is  
13 that -- if there's a link in a document, it would  
14 be something you could click on and you'd then see  
15 the document? 03:52:18

16 A. My understanding is that this is a --  
17 some form of online document system, yes.

18 Q. So in -- in Ms. Chang's email to Ime and  
19 Chris, she provides a -- some recommendations for  
20 how to bucket different partners in this analysis; 03:52:41  
21 is that right?

22 A. It's hard to confirm what she -- what  
23 she's doing here without seeing the original  
24 document.

25 She's referring to -- to tabs, for sure. 03:53:00

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1 A. I think you read that correctly, yeah. 03:58:25

2 Q. And so based on this, it appears that one  
3 of the considerations for deciding how to -- or  
4 whether to continue to allow access to read stream  
5 or friend data is the strategic value of the 03:58:43  
6 partner to Facebook, correct?

7 MR. DAVIS: Objection. Form. And scope.

8 THE DEPONENT: I wouldn't say that's  
9 correct. This is a document containing the  
10 opinions and ideas of a specific partner manager 03:59:01  
11 around nine months before the -- the changes  
12 were -- were introduced. This doesn't, I think,  
13 reflect on ultimately how decisions were made.

14 Q. (By Mr. Loeser) What -- what is -- what  
15 is strategic value? 03:59:19

16 What is meant by that?

17 A. I don't think I can answer what -- what  
18 Jackie meant by strategic value in -- in her email.  
19 I think that would be a question for her.

20 Q. And -- and what does Facebook mean by 03:59:32  
21 strategic value?

22 A. I think strategic value could be  
23 construed to mean many different things. I don't  
24 think this is specific -- Facebook does not have a  
25 specific definition of what strategic value means. 03:59:46

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